

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 3:08-CV-30132-MAP

SPRINGFIELD SCHOOL COMMITTEE,
Plaintiff,
v.
QUETZAL DOE, By and Through his Educational
Surrogate Parent BRYAN CLAUSON, ESQ.,
THE MASSACHUSETTS DEPARTMENT
OF ELEMENTARY AND SECONDARY EDUCATION,
And THE BUREAU OF SPECIAL EDUCATION
APPEALS.
Defendants.

PLAINTIFF'S OPPOSITION TO DEFENDANT, QUETZAL DOE'S, MOTION FOR
SUMMARY JUDGMENT AND PLAINTIFF'S CROSS MOTION FOR SUMMARY
JUDGMENT

Pursuant to F.R.C.P. Rule 56, Plaintiff Springfield School Committee opposes the Defendant Quetzal Doe's Motion for Summary Judgment, and further moves for summary judgment in its favor.

As reason therefore, Plaintiff states that there are no genuine issues of material fact and judgment should be entered on all counts of Plaintiff's complaint in its favor. A memorandum of law in support of Plaintiff's opposition to summary judgment and cross motion for summary judgment accompanies this motion.

REQUEST FOR ORAL ARGUMENT

The Plaintiff hereby requests that that Court set this matter for oral argument because it is the Plaintiff's position that oral argument will assist the Court in rendering a ruling in this matter.

Respectfully Submitted,
SPRINGFIELD PUBLIC SCHOOLS
By Its Attorneys,

/s/ Regina Williams Tate

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